

**Federal Defenders
OF NEW YORK, INC.**

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June 23, 2025

VIA ECF

Honorable Judge Ronnie Abrams
United States District Judge
Southern District of New York
United States Courthouse
40 Foley Square
New York, NY 10007

Application granted.

SO ORDERED.



Ronnie Abrams, U.S.D.J.

June 23, 2025

**Re: United States v. Foster Cooley
22 Cr. 651 (RA)**

Dear Judge Abrams:

I write on behalf of my client Foster Cooley to respectfully request that Your Honor order pretrial services to release Mr. Cooley's passport on Wednesday, June 25, 2025 ahead of his previously approved travel to China. On March 10, 2025, Your Honor granted Mr. Cooley's bail modification to permit him to travel to China with his family for his brother's college graduation from Peking University. It is the defense's understanding that pretrial services in Arizona – where Mr. Cooley is currently being supervised – requires a passport release order to allow Mr. Cooley to retrieve his passport in advance of his travel, which is scheduled for Thursday, June 26, 2025. Upon his return from China, on July 7, 2025, Mr. Cooley will return his passport to pretrial services 24 hours after his arrival. Indeed, the above-described travel plans have already been coordinated with and approved by pretrial services. As such, the defense requests that Mr. Cooley's passport be released on Wednesday, June 25, 2025, to permit his already approved travel to China scheduled for June 26, 2025 to July 7, 2025.

Thank you for your consideration of this request.

Respectfully submitted,

/s/
Marisa K. Cabrera
Assistant Federal Defender
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Cc: AUSA Andrew Chan